The Hazard Communication Standard

The Hazard Communication Standard, also known as the Worker's Right-to-Know Law, was enacted by OSHA to ensure that hazards in the workplace are identified and communicated to all employees and employers. This transmittal of information is accomplished through a comprehensive hazard communication program which includes container labeling, material safety data sheets, and employee training.

This standard places several requirements on facilities which have even one hazardous chemical in their workplace. Hazardous chemicals are substances which pose potential physical or health hazards and therefore by definition are fairly broad-based. Examples include oils, antifreeze, gasoline, corrosives, solvents, etc. **For the purposes of this document, all chemicals used in vehicle maintenance shops are considered hazardous and will therefore be collectively referred to as "chemicals."**

The Hazard Communication Standard applies to any business, including vehicle maintenance shops, that uses, distributes, or imports hazardous chemicals, *regardless of the number of individuals employed*. All facilities must satisfy the following five requirements to be in compliance:

1. Evaluate all chemicals in the workplace to determine if they are hazardous (hazard determination).

2. Develop a written hazard communication program.

3. Ensure that all hazardous chemicals used in the workplace are properly labeled.

4. Maintain an updated inventory of material safety data sheets (MSDS) for each hazardous chemical in the workplace.

5. Provide information and training on hazardous chemicals found in the workplace to all employees.

Categories of the Worker's Right-to-Know Law

Chemical Inventory/Hazard Determination

The first category requires you to inventory all chemicals found in your workplace to determine if they are hazardous. This hazard determination should be based on information provided by the chemical manufacturer. The actual procedure you use to determine the hazard of each chemical must be in writing.

Performing a chemical inventory is most easily accomplished by walking through your facility and recording the name of every chemical used or found (i.e., office supplies, household cleaners, solvents, fuels, paint, lubricants, etc.). Do not base your hazardous determination merely on the presence or absence of a material safety data sheet (MSDS) or warning label. The inventory list should include all chemicals, especially those with the following characteristics:

- flammable, combustible, or ignitable;
- causes skin, eye, or respiratory irritation;
- dangerous if swallowed; and/or
- produces problems when mixed with other chemicals (e.g., bleach & ammonia.)

The name of each chemical added to your inventory list should correspond to the name identified on its MSDS, if one is available. Other useful information worth recording on the inventory list includes: the chemical's trade or manufacturer's name; whether an MSDS is available for that chemical; and the chemical's location in your shop. When completed, this inventory list will become a component of the hazard communication program.

Examples of vehicle maintenance products covered by the Hazard Communication Standard include:

Gasoline	Oils	Brake Fluids	Freon
Antifreeze	Detergents	Parts Cleaner	Caustics

Asbestos (as part of brakes)

Metals, such as Chromium, Lead, Zinc (as part of stainless steel, bearings, etc.)

Solvents (even those in spray cans)

Condenser Cleaners (usually a corrosive substance)

Chemical Labeling

This second category requires labeling of all chemical containers (i.e., spray bottles, drums, storage tanks, etc.) in your workplace. All such containers should be labeled by the manufacturer, and every effort should be made to keep these substances in their original containers. These labels warn employees of the chemical's potential dangers and provide a source for obtaining further information about the substance. The label provided by the manufacturer should contain the following:

1) Identity of the hazardous chemical(s);

2) Appropriate hazard warning; and

3) Name & address of the chemical manufacturer, importer, or other responsible party.

Employers should check to see that all newly-delivered chemicals are properly labeled. *If a proper label is not attached, refuse shipment until a proper one is applied.* The chemical manufacturer may be able to supply you with additional labels as needed.

OSHA does not require a specific labeling system as long as the above information is provided, is legible, and is in English. All chemicals arriving in the workplace should have the required manufacturers' hazardous label on the container. It is, therefore, unnecessary to re-label any container unless:

1) the label is worn, destroyed, or becomes outdated; or

2) the chemical is transferred into a smaller container.

Material Safety Data Sheet (MSDS)

The Hazard Communication Standard requires all chemical manufacturers and importers of hazardous chemicals to obtain or develop an MSDS for each chemical they produce or import. Employers, including vehicle maintenance shops, are required to have an MSDS for each hazardous chemical they use.

The employer is not responsible for information on the MSDS which they have not prepared, but it is their obligation to check the document for obvious inaccuracies. If an MSDS is found to be incomplete, inaccurate, or outdated, the employer needs to contact the manufacturer to request a corrected copy. MSDSs are typically available from the chemical manufacturer or supplier but it is the employer's responsibility to assure their presence with each chemical received. *(See sample letter on page 17.)*

MSDSs contain specific hazard information such as:

1) physical and health hazards;

2) routes of entry;

3) exposure limits;

4) precautions for safe handling;

5) spill clean-up procedures;

6) personal protective equipment required;

7) emergency and first aid procedures; and

8) the name, address and telephone number of the manufacturer.

All of this information on the MSDS must be in English and available to all employees working with or near the hazardous chemical. A copy of the MSDS should also be available to members of your community, by request, as a component of the Community-Right-to-Know law (see SARA Title III).

Employee Training & Information

This category requires employers to provide employees with information and training on all chemicals found in their workplace at the time of initial assignment and whenever a new hazard (chemical) is introduced into their area. Training needs to be provided to those employees who have the potential for exposure to any chemical. It is always better to overtrain than to mistakenly overlook someone that you didn't think needed to be trained.

The intent of this category is to ensure that employees have the appropriate information and training before they are exposed to a chemical. Employers need to provide information about the standard, where hazardous chemicals are present, along with the location and availability of the hazard communication program, hazard chemical inventory, and MSDS(s).

Training should be specific to the workplace and includes: methods and observations used to detect the presence or release of the chemical; physical and health hazards; protective measures required; labeling; and explanation of the MSDS. All chemicals listed on the hazardous chemical inventory should be covered in the training. Training should allow for interaction between the instructor and the employees to ensure they understand the information presented.

Employers are responsible for ensuring that all affected employees comprehend and apply the information provided to them. They should know the location of the MSDS(s), how to read a label, have general knowledge of the hazardous chemicals in the workplace, and how to respond appropriately in emergency situations. Each employee's level of knowledge with regard to training and information of this standard can be obtained through testing or by demonstration of their knowledge. Informational posters, employee incentives, etc. may help ensure the retention of the training and information provided.

Always document your training and retrain as necessary (at initial job assignment

or when job assignment is changed, when new chemicals are introduced into the workplace and when exposure risk changes). Training records must include the date and content of the program; name and qualifications of the instructor; and a list of attendees. These records should be kept for duration of employment plus an additional thirty (30) years.

The Written Hazard Communication Program

This written hazard communication program combines all of the required components of the standard (hazard determination, chemical inventory list, labels, MSDS, information and training) into one working document. This written program should address at least the following topics:

- How the hazard chemical determination will be conducted.
- The methods the employer will use to inform employees of the hazards of non-routine tasks.
- How the employer will notify contractors working on-site of hazards found in the workplace. Include how information on your labeling system, MSDS(s) and a copy of your Hazard Communication Program will be provided to the contractor, which routine precautions need to be taken, and proper emergency procedures.
- How container labeling will be handled.
- How training and information will be provided.
- Methods for obtaining, organizing, and distributing MSDSs.

A copy of the written program must be made available upon request to all employees and OSHA officials.

> A more detailed guide covering the development of a written Hazard Communication Program is available from the Bureau of Safety Education and Training (BuSET.)
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> This guide is available free of charge and may be obtained by calling BuSET at (317) 232-2688 or by using the BuSET order form on the Fax-On-Demand system.

Written Hazard Communication Program

I. Introduction

A. Statement of Need

_____ vehicle maintenance shop has implemented a Hazard Communication Program for two reasons:

- To assist_____vehicle maintenance shop in achieving our ultimate goal of a safer working environment for our employees.
- To comply with the Federal Occupational Safety and Health (OSHA) Standard (1910.1200).

B. Background

To reduce the incidence of chemically related occupational illness and injury, the Occupational Safety and Health Administration (OSHA) published the Hazard Communication Standards in November, 1983. In 1987 the standards were expanded to include non-manufacturing employers. These standards provide employees with the "right to know" about the hazards of the chemicals they handle and those available in their workplace.

C. Anticipated Benefits

Several benefits are anticipated with the implementation of _____vehicle maintenance shop's Hazard Communication Program. These include:

1. Overall improvement of_____vehicle maintenance shop's safety program.
2. Prevention of chemical related illnesses and injuries.
3. Avoidance of OSHA citations, violations, and related compliance costs.
4. Improvement of employer-employee relations by establishing regular lines of communication.

II. Purpose

The purpose of _____'s Hazard Communication Program is to ensure that the hazards of all chemicals located in the facility are evaluated and that information concerning physical and health hazards are transmitted to employees who may potentially be exposed to these substances. It is not only the intent of _____ to fully comply with the OSHA Standard 1910.1200, but also to improve the overall safety of our business. A successful Hazard Communication Program will reduce potential incidents of chemical related illnesses and injuries.

III. Authority

_____ 's Hazard Communication Program is required by the Occupational Safety & Health Administration, pursuant to Title 29 CFR Subpart Z part 1910.1200.

The owner/operator shall have the authority and responsibility to assure compliance with all regulations governing hazardous materials and waste management. In the event of noncompliance, immediate corrective action is to be taken while a plan for permanent correction is developed and implemented.

The owner/operator of _____Vehicle maintenance Shop shall determine hazardous materials policies and procedures which will be in writing and available upon request to employees and government officials.

IV. Summary of Title 29 Subpart Z Part 1910.1200, Hazard Communication Standard, effective May 23, 1988.

The passage of the OSHA's Hazard Communication Standard gives _____ vehicle maintenance shop the responsibility to establish a written, comprehensive program which includes provisions for container labeling, material safety data sheets (MSDS), employee information and training. The written program must contain a list of the hazardous chemicals in each work area, the means used to inform employees of hazards of non-routine tasks and methods used to inform contractors in our facilities of chemical hazards to which they may be exposed.

This written Hazard Communication Program is _____ 's plan to comply with the objectives of the standard. Each objective will be specifically defined and discussed in this document. Additionally, this written program must be reviewed during employee training and a copy available to each employee upon request.

V. Objectives

1: List of chemicals used at _____Vehicle maintenance Shop:

The owner/operator is required to complete and have available the entire inventory of chemicals available in the facility. This list will be located in _____, while a master list will be kept on file in the _____.

Procedure for Chemical Inventory Update (several methods will be utilized to maintain an updated chemical list.)

A. The owner/operator will have a chemical inventory on file. New chemical products purchased will be immediately reported to the owner/operator, who will evaluate the new product's MSDS to determine if the product should be included in the Hazard Communication Program.

B. As new chemicals are purchased, they will be recorded on the chemical inventory list. Changes in inventory will be noted on the inventory form with updates provided to effected employees.

2: Material Safety Data Sheets (MSDS)

Materials Safety Data Sheets are the keystone to a successful Hazard Communication Program. MSDSs are designed to provide the information needed to handle chemicals safely. They provide the necessary information for training, hazard evaluation, proper handling, emergency procedures, and employee personal protective equipment. The following procedures will be implemented to ensure that _____vehicle maintenance shop maintains an MSDS for all chemicals identified on the chemical inventory and the local purchase inventory.

A. Chemical manufacturers supplying the facility with products are required to make available upon request an MSDS for each product shipped. As MSDSs are checked off against the chemical inventory, missing MSDS should be requested in writing from the respective manufacturer.

B. The owner/operator will document attempts to obtain all MSDSs.

C. The owner/operator will require an MSDS for each new chemical purchased, as well as updated MSDS for existing chemicals. This requirement will be indicated on all purchase orders. The owner/operator will then maintain a file of all current MSDSs.

D. Copies of the appropriate MSDSs will be provided by the owner/operator and maintained and readily available throughout the facility. A copy of all MSDSs will be maintained in the following locations:

1. _____

2. _____

3. State Emergency Response Commission

4. _____Fire Department

F. A program to better understand and interpret an MSDS will be available and will serve as a training discussion item.

G. Updated and new MSDSs will be immediately placed in binders. Owner/operators are responsible for in-servicing all employees in their respected area on the new and updated MSDS when that information becomes available.

H. _____vehicle maintenance shop will rely on each chemical manufacturer's testing and hazard evaluation of chemical products used throughout the plant.

3: Labeling Procedures

A. Original Containers - _____vehicle maintenance shop will rely heavily on chemical suppliers to provide labeling on their products used in the business that meets the requirements of 1910.1200 (f). To comply, the label must contain the following:

1. The identity of the hazardous chemical.

2. The appropriate hazard warning (including target organ, route of entry, and health hazards.)

3. The name and address of the chemical manufacturer.

B. Shipped Containers - with each chemical shipment, the owner/operator will check all containers to ensure that all labels meet the requirements outlined in this program. *The owner/operator will not accept improperly labeled containers*. If there is a problem with a container, owner/operator should be notified immediately.

The owner/operator will check the chemical inventory to ensure that the MSDS has been received and updated for the product.

C. Local Purchases of Shelf Stock Chemicals - The following procedures will be implemented to ensure that local purchases of shelf stock chemicals (i.e., cleaning agents or other maintenance supplies) are properly labeled:

1. A local purchase inventory must be maintained.

2. Purchases of shelf-stock chemicals which are not listed on the inventory will be reported to the owner/operator.

3. The owner/operator must inspect local purchases for their condition and whether these items meet the minimum label requirements of 1910.1200 (f) (1) (i, ii, iii). Chemicals that do not meet these minimum labeling requirements should not be purchased or allowed into the facility.

D. Individual Portable Containers - Each chemical transferred from the original container into individual portable ones, which will be used *immediately* that day, by a single individual during their shift, does not require labeling.

Those chemicals transferred for later use or utilized by multiple individuals, must have identifying labels affixed to the container providing the following information:

1. Identification of the hazardous chemical

2. Appropriate hazard

These labels may be handwritten

The owner/operator or supervisor is responsible for ensuring that proper labeling is on all individual portable containers used in their areas.

4: Employee Training

The Hazard Communication Standard requires the _____Vehicle maintenance Shop to provide information and training to employees who have the potential of being exposed to hazardous chemicals in their work areas. Additionally, the employer must also explain the components and objectives of its written Hazard Communication Program to its employees.

The owner/operator is responsible for developing procedures for maintaining detailed records of all Hazard Communication training.

A. Initial Training of Employees - Training of personnel will be administered by the owner/operator or their designee. He/she will utilize a variety of teaching methods (i.e., written materials, charts, audio-visuals, etc.), in addition to general discussion, when training the employees.

B. New Employees - Will receive training promptly during initial employee orientation.

C. Existing Employees - Will be trained when transferred to a work area where new or different hazardous chemicals are used. Retraining as needed will be the responsibility of the owner/operator and will be documented and kept in the employee's personnel file.

D. Educational objectives - The owner/operator is responsible for developing procedures for educating their personnel in compliance with this Hazard Communication Program. These procedures include detailed job-specific information for their department. At a minimum, the Hazard Communication educational procedures must address the following:

1. The Hazard Communication Standard.
2. Understanding and interpreting the information on labels and MSDS.
3. How employees can obtain and use the available hazard information.
4. The location of the written Hazard Communication Program, MSDS, and inventory list of hazardous chemicals in the workplace.
5. Chemicals and hazards that the employee may potentially be exposed to in their work area.
6. Container Labeling.
7. Chemical Storage Locations.
8. Proper recognition and handling of hazardous chemicals.
9. Proper use and location of safety & personal protective equipment.
10. Methods and/or observations to detect the presence of hazardous materials.
11. Emergency response and evacuation procedures.

5: Procedures to Assess Hazards of Non-Routine Tasks

Non-routine tasks are those tasks which do not occur on a frequent basis or those tasks which are not identified as a normal production task. Those non-routine tasks required of vehicle maintenance personnel will be evaluated on a case-by-case basis as needed to determine if they are considered to be in compliance with this program.

6: Contract work performed at _____vehicle maintenance shop

A. Contractors will receive a list of chemicals used in the work area.

B. All contractors will be required to notify _____vehicle maintenance shop of hazardous chemicals brought onto the premises.

C. A copy of our Hazard Communication Program will be available to the contractors from the owner/operator.

D. A list of chemicals and corresponding MSDS will be available to the contractor from the owner/operator.

E. Appropriate project training will be conducted by the project or job supervisor for all persons associated with the project, including contractors, when hazardous materials will be used or disposed of.

F. Training will be accomplished prior to starting the job or project and will include the following:

1. A discussion of the information listed on the MSDS for each hazardous material used during the job or project.

2. Job specific details for storing, using, and disposing of the hazardous materials used during the job or project.

3. Job specific spill, leak, and uncontrolled reaction procedures.

4. Appropriate evacuation procedures.

5. Job specific safety and personal protective equipment and the proper use of both.

G. A record of the project training will be retained in the employee file by the owner/operator.

7: Storage of Hazardous Materials

The owner/operator is responsible for the proper storage of hazardous materials in the plant. Follow the guidelines provided in the corresponding MSDS for proper storage of the chemical.

8: Spill Cleanup, Removal, & Disposal

The owner/operator or their designee is responsible for the proper clean up of spills, removal, and disposal of hazardous materials in their area. Follow the guidelines provided in the corresponding MSDS for proper spill and disposal procedures.

9: Monitoring and Evaluation of Program

The owner/operator will monitor and evaluate the effectiveness of the Hazard Communication Program, on a quarterly basis, through:

A. Review of occurrence reports relating to hazardous material events, with appropriate follow up action if necessary.

B. Hazard Communication Program inspections, with follow up recommendations for correction if deficiencies are identified.

C. Evaluation of employee education programs.

D. The policy will be reviewed annually and updated accordingly by the owner/operator.

Approved by: Date:

Form Letter for Obtaining a
Material Safety Data Sheet (MSDS)

Letterhead

Date

Name and address of MSDS supplier

(manufacturer, importer or distributor)

Dear Mr. or Ms.:_____
My company recently purchased your product _____
and a Material Safety Data Sheet (MSDS sheet) was not provided.

Please send me an appropriate MSDS sheet which will meet the requirements set forth in the OSHA standards 29 CFR 1910.1200 and 29 CFR 1926.59

Thank you for your cooperation.

Sincerely,

Employee name

Job Title